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June 2, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

In the Matter of the Application of adidas AG for an Order of Attachment in Aid of Arbitration - Case No. 22-mc-320 (VEC)

Dear Judge Caproni:

Pursuant to the Court's May 30, 2023 Order denying the pending motions to seal and directing the Parties to show cause why this matter should not be unsealed in its entirety or with very narrowed redactions, Petitioner adidas AG ("adidas") submits this letter motion in support of the Parties' joint revised redactions. Specifically, the Parties propose to lift redactions from significant portions of the record reflecting information stated in open court during the May 30, 2023 hearing. adidas and Respondents have conferred on the revised redactions, and Respondents consent to those revised redactions.

The revised redactions to all filings and orders in this proceeding subject to prior redactions and motions to seal are being submitted via file transfer (due to their large file size) to Chambers contemporaneously herewith. The information as to which the Parties propose removing the redactions is highlighted in orange, with the exception of the Court's May 16, 2023 Sealed Order to Revise Redactions, ECF No. 43, in which, to avoid confusion with other highlighting in that document, such information is highlighted in green. With respect to all documents submitted, the limited information that the Parties propose to keep under seal is highlighted in yellow.

The proposed redactions are limited to information (which was not disclosed at the May 30, 2023 hearing) reflecting confidential terms of the Licensing and Endorsement Agreement between Yeezy and adidas and/or confidential information concerning the claims and counterclaims asserted in the arbitration between Yeezy and adidas. While the issues relating to the Marketing Funds were described in open court, the Parties have diligently worked to keep confidential other commercially sensitive terms of the Agreement, the details of their broader dispute, and the preliminary findings of the audit. In support of redacting these categories of information, adidas incorporates by reference its prior arguments regarding the same.

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See ECF No. 36. The Court has previously approved redactions of these categories of information in prior filings in this matter. *See* ECF Nos. 37, 43.

Respectfully submitted,

/s/ William H. Taft V

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cc: All counsel of record